

IN RE:	Lisa M. Williams Debtors	Case No.: 20-11627-pmm
	Lisa M. Williams Movant v.	Chapter: 13
	SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of LB-Cabana Series IV Trust KENNETH E. WEST- Trustee Respondents	Judge: Patricia M. Mayer

RESPONSE TO DEBTOR'S MOTION TO REIMPOSE AUTOMATIC STAY

PLEASE TAKE NOTICE that SN Servicing Corporation as servicer for US Bank Trust National Association as Trustee for LB-Cabana Series IV Trust (“Secured Creditor”), the holder of a mortgage on real property of the debtor’s, located at 5617 1/2 North Palethorp Street, Philadelphia, PA 19120 (Mortgage Premises”) , by and through its undersigned attorneys, hereby responds to the Debtor’s Motion to Reimpose the Automatic Stay as follows:

1. Admitted.

2. Denied. Creditor is without sufficient information as to form a belief as to the veracity of this averment and it is therefore denied. Without waiving the foregoing and by way of further response, it is specifically denied that Debtor made all post-petition payments. As of the time of filing of this instant Response, Debtor would be due for the February 1, 2023, post-petition payment had relief not been granted on March 9, 2023, at Doc. 74 following Creditor’s filling of an unopposed Certification of Default. Moreover, Debtor has not provided proof of a lump sum amount to reinstate this fourteen (14) month delinquency.

3. Denied. For the foregoing reasons, Creditor requests that the Court deny Debtor’s Motion to Reinstate the Automatic Stay.

WHEREFORE, Secured Creditor respectfully requests that the Debtor's Motion be denied and for all other and further relief as is just and proper.

Dated: April 9, 2024

By: /s/Lauren Moyer
Lauren Moyer Esq.
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Trust National Association as Trustee for LB-
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Lisa M. Williams Debtors	Case No.: 20-11627-pmm
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ORDER

AND NOW, this 9th day of April, 2024, upon consideration of Debtor's Motion to Reimpose the Automatic Stay filed on March 27, 2024, and the Response and Objection of SN Servicing Corporation as servicer for US Bank Trust National Association as Trustee for LB-Cabana Series IV Trust, it is hereby **ORDERED** and **DECreed** that the Debtor's Motion to Reimpose Automatic Stay is **DENIED**.

BY THE COURT:

Patricia M. Mayer, Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Lisa M. Williams Debtors	Case No.: 20-11627-pmm
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**CERTIFICATE OF SERVICE OF RESPONSE AND OBJECTION TO DEBTOR'S MOTION
TO EXTEND AUTOMATIC STAY**

I certify that I caused to be served the Response and Objection to Debtor's Motion to Extend Automatic Stay of SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of the Cabana Series IV Trust on the persons at the addresses specified below or on the attached list on April 9, 2024.

The type(s) of service made was first-class mail and electronic notification as indicated on the attached list.

Date: April 9, 2024

FRIEDMAN VARTOLO, LLP.

By: /s/Lauren Moyer
Lauren Moyer Esq.
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Service by NEF

Trustee

KENNETH E. WEST
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Debtor's Counsel

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19102

U.S. Trustee

Office of the U.S. Trustee
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Service by First-Class Mail

Debtor

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PA